## DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

Case No. 1:23-cv-00012-WAL-EAH

LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, PORT HAMILTON REFINING & TRANSPORTATION, WEST INDIES PETROLEUM LTD., and LIMETREE BAY REFINERY, LLC, as a nominal Defendant

Defendants.

## NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 45(a)(4), Defendant Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals, by and through its undersigned counsel, intends to serve Subpoenas to Produce Documents ("Subpoenas") on the parties listed below:

- 1. Records Custodian, Acute Sleep Center, 902 Peach Tree Forest Terrace, Norcross, GA 30092;
- 2. Records Custodian, Covington Family Care and Specialty Group, 495 Winn Way, Suite 100, Decatur, GA 30030;
- 3. Records Custodian, Acute Alternative Medical Group, 4000 Ruby Plaza, Suite 3, Christiansted, VI 00820;
- 4. Records Custodian, Imaging Center PC, 4B Island Medical Center, Sunny Isle, VI 00820-4423;
- 5. Records Custodian, Dekalb Neurology Group, 2665 N. Decatur Road, Suite 540, Decatur, Georgia 30033;
- 6. Records Custodian, Pulmonary & Sleep Medicine Associates, LLP, 132 Old Norton Road, Suite 101, Fayetteville, GA 30215;

- 7. Records Custodian, Governor Juan F. Luis Hospital, 4007 Estate Diamond Ruby, Christiansted, St. Croix, VI 00820;
- 8. Records Custodian, Grady Memorial Hospital, 80 Jesse Hill Jr. Drive SE, Atlanta, GA 30303;
- 9. Records Custodian, Grady Toxicology Clinic, 80 Jesse Hill Jr Drive SE, Atlanta, GA 30303;
- 10. Records Custodian, Piedmont Healthcare, 135 North Park Place, 2<sup>nd</sup> Floor, Suite 200, Stockbridge, GA 30281;
- 11. Sharon Johnson, PHD, 245 County Club Dr., Suite 100A, Stockbridge, GA 90281;
- 12. Athena Sotus-Nawar, M.D., 5635 Peachtree Pkwy, Suite 180, Norcross, GA 30092;
- 13. John Moseri, M.D., 1810 Moseri Road, #5116, Decatur, GA 30032;
- 14. Records Custodian, Blue Cross Blue Shield for Federal Employees, 750 9th Street NW, Washington, DC 20001;
- 15. Records Custodian, GEHA Insurance Company, 310 NE Mulberry Street, Lees Summit, MO 64086;
- 16. Records Custodian, Aetna Insurance Company, 151 Farmington Avenue, Hartford, CT 06156;
- 17. Records Custodian, United States Virgin Islands Department of Labor, Workers' Compensation Division, 4401 Sion Farm, Suite 1, Christiansted, VI 00820-4245; and
- 18. Georgia State Board of Workers Compensation, Attention: Copy Unit, 270 Peachtree Street, NW, Atlanta, GA 30303-1299.

True and correct copies the Subpoenas were served on all counsel of record on August 15, 2024.

DATED: August 16, 2024

## **AKERMAN LLP**

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By: /s/Donnie M. King

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Counsel for Defendant Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals

## **CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed with the Court's electronic filing system on August 16, 2024, which will send a notice of electronic filing to all counsel of record.

/s/Donnie M. King
Donnie M. King